

JTM
CLD / JK: 2020R00157

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

JAMES ROGER MAYNARD JR.,

Defendant.

* CRIMINAL NO.
* SAG-20-0206
* (Sexual Exploitation of a Minor, 18
* U.S.C. § 2251(a); Coercion and
* Enticement, 18 U.S.C. § 2422(b);
* Transfer of Obscene Material to a
* Minor, 18 U.S.C. § 1470; Penalties for
* Registered Sex Offenders, 18 U.S.C.
* § 2260A; Forfeiture, 18 U.S.C. §§ 2253;
* 2428 and 1467)
*
*

INDICTMENT
COUNT ONE

(Sexual Exploitation of a Minor)

The Grand Jury for the District of Maryland charges that:

On or about November 27, 2019 and continuing through on or about November 29, 2019,
in the District of Maryland and elsewhere, the defendant,

JAMES ROGER MAYNARD JR.,

did knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the defendant caused the production of a series of visual depictions of Victim #1, a minor female, at least one of which depicted the lascivious display of the minor's genitals, which were solicited and transported in via his internet-based Facebook account.

18 U.S.C. § 2251(a)

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U.S. DISTRICT COURT
DISTRICT OF MARYLAND
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COUNT TWO
(Coercion and Enticement)

The Grand Jury for the District of Maryland further charges that:

On or about November 27, 2019 and continuing through on or about November 29, 2019,
in the District of Maryland and elsewhere, the defendant,

JAMES ROGER MAYNARD JR.,

did knowingly use and attempt to use a facility and means of interstate and foreign commerce to knowingly persuade, induce, entice and coerce minors to engage in sexual activity for which any person could be charged with a criminal offense, that is, the defendant communicated with Victim #1, a minor female, using his internet-based Facebook account, to persuade, induce, entice and coerce the minor victim to engage in sexually explicit conduct, and to take and send him photographs of such conduct via the internet, in violation of 18 U.S.C. §§ 2251(a) and 2252A(a)(2), and Md. Code, Crim. Law § 11-207(a)(1).

18 U.S.C. § 2422(b)

COUNT THREE
(Transfer of Obscene Material to a Minor)

The Grand Jury for the District of Maryland further charges that:

On or about November 27, 2019 and continuing through on or about November 29, 2019, in the District of Maryland and elsewhere, the defendant,

JAMES ROGER MAYNARD JR.,

by any facility and means of interstate and foreign commerce, knowingly attempted to and did transfer obscene matter to another individual who had not attained the age of 16 years, knowing that the other individual had not attained the age of 16 years, that is, the defendant used his internet-based Facebook account to send at least one image of what he represented was his penis to Victim #1, a minor female, whom the defendant believed to be a minor female under the age of 16.

18 U.S.C. § 1470

COUNT FOUR
(Penalties for Registered Sex Offenders)

The Grand Jury for the District of Maryland further charges that:

On or about November 27, 2019 and continuing through on or about November 29, 2019,
in the District of Maryland and elsewhere, the defendant,

JAMES ROGER MAYNARD JR.,

committed felony offenses involving a minor charged in Count One and Count Two of this
Indictment at times the defendant **JAMES ROGER MAYNARD JR.** was required to register as
a sex offender under the laws of the State of Maryland.

18 U.S.C. § 2260A

SPECIAL ALLEGATION

The Grand Jury for the District of Maryland further charges that:

Prior to on or about November 27, 2019, the defendant,

JAMES ROGER MAYNARD JR.,

had a prior conviction under the law of any State relating to aggravated sexual abuse, sexual abuse, and abusive sexual conduct involving a minor or ward, and the production, possession, receipt, mailing, sale, distribution, shipment, and transportation of child pornography, to wit:

- On or about October 17, 2014, **MAYNARD** was convicted of “Sexual Solicitation of a Minor” in Baltimore City Circuit Court Case # 114121022, in violation of Maryland Criminal Code Ann. § 3-324.

18 U.S.C. § 2251(e)

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further charges that:

1. Pursuant to Title 18, United States Code, Sections 2253, 2428 and 1467, upon conviction of the offense set forth in Counts One, Two and Three of this Indictment, in violation of Title 18, United States Code, Sections 2251(a), 2422(b) and 1470, the defendant,

JAMES ROGER MAYNARD JR.,

shall forfeit to the United States of America:

a. any visual depiction described in Title 18, United States Code, Sections, 2251, 2251A, or 2252A, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, received or possessed in violation of Title 18, United States Code, Chapter 110;

b. any property, real or personal, that was involved in, used, and intended to be used to commit or to facilitate the commission or any property traceable to such property; and

c. any property, real or personal, constituting or derived from, any proceeds that such person obtained, directly or indirectly, as a result of such violation, or any property traceable to such property.

2. The property to be forfeited includes, but is not limited to, the following:

a. a Galaxy S9 cellular phone, Model SM-G960U, serial number R38KZ0HZ3TB.

3. If any of the property described above, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property that cannot be subdivided without difficulty; the United States shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b) and Title 28, United States Code, Section 2461(c).

18 U.S.C. § 2253
18 U.S.C. § 2428
18 U.S.C. § 1467
28 U.S.C. § 2461(c)

A TRUE BILL:


FOREPERSON

Robert K. Hur / CLD
Robert K. Hur
United States Attorney

WPB
7/21/2020 7/21/2020
Date